

JUDGE HIBBLER

MAGISTRATE JUDGE MASON

AO

EXHIBIT 2

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAMES ROWE, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

Case No.

UNICARE LIFE AND HEALTH
INSURANCE COMPANY, and WELLPOINT,
INC., both Indiana Corporations,

Defendants.

AFFIDAVIT OF LYNDA J. GROSS

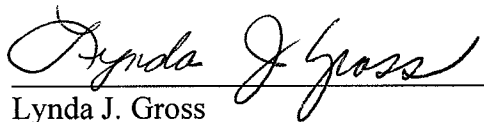
I, Lynda J. Gross, hereby declare:

1. I have personal knowledge of the facts stated herein, and I am competent to testify if called upon as a witness herein.
2. I am currently employed by Wellpoint, Inc. and hold the position of Director II, Customer Care Service Operations, Central Market.
3. I have reviewed lists reflecting the addresses of the customers to whom Wellpoint, Inc. sent notice letters in 2007 and 2008 regarding a security breach. There were more than 200,000 total customers who were sent such letters.

CERTIFICATE UNDER SECTION 1746

I declare under penalty of perjury under the laws of the United States of America that the foregoing Affidavit is true and correct.

Dated: April 14, 2009


Lynda J. Gross